

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-10096-JLT
)	
JUDY COLLYMORE)	

JOINT SUBMISSION OF THE PARTIES UNDER LOCAL RULE 116.5(C)

Pursuant to Local Rule 116.5(C), the parties state as follows:

1. Outstanding Discovery Issues

The parties are not aware of any outstanding discovery issues not yet presented to or resolved by the Court.

2. Anticipated Additional Discovery

The parties are not aware of any discovery required to be produced pursuant to the Local Rules that has not already been produced or addressed by counsel. Should the parties become aware in future of any additional discovery that needs to be disclosed, such discovery will be provided in accordance with the Local Rules.

3. Defense of Insanity or Public Authority

The defendant has not indicated an intent to assert a defense of insanity or public authority.

4. Notice of Alibi

The defendant has not indicated an intent to assert an alibi

defense.

5. Dispositive Motions

The defendant has not indicated an intent to file any motions to dismiss, or suppress, or any other motion requiring a ruling by the District Court before trial.

6. Scheduling

The parties are not aware of any issue requiring scheduling but request some additional time to continue efforts to resolve the case, as discussed below.

7. Plea Negotiations

The government has discussed with the defendant the possibility of an early resolution of the case without a trial. The discussions are continuing and are nearly resolved at this time. The parties do request additional time to finalize the discussions.

8. Excludable Delay

Pursuant to previous orders of this court, all but fourteen days has been excluded from the calculations of the Speedy Trial Clock. Thus, there are 56 days remaining for a trial in this case. The parties request that the period between April 4, 2005 and any additional conference be excluded from the Speedy Trial Clock, in the interests of justice.

9. Whether Trial is Anticipated; Length of Trial

The government does not anticipate a trial in this case, if

there is a trial it will last approximately one week.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

S/ Glenn A. MacKinlay
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s/ Page Kelley
PAGE KELLEY, Esquire
for the defendant Judy Collymore

Dated: April 4, 2005